Letter Number 41

COMMITTEE FOR IDAHO'S HIGH DESERT

P.O. BOX 463 BOISE, IDAHO 83701

AUG 6 1984

RECEIVED
BUREAU OF LAND MANAGEMENT
SHOSHONE, IDAHO 83352

Ervin Cowley, District Manager
BLM
Box 2 B
Shoshone ID 83352

Dear Sir:

We wish to comment on the Monument RMP draft.

We have so many objections to the information in the present Draft Plan, and to the methods by which it is manipulated to reach the preferred alternative the Draft Plan embraces, that we urge you to withdraw and entirely rewrite this plan. In general, we say this with an eye to 43USC1701(a)(7), (8), and (10); to 43USC1702(c); to 43USC1712(c)(9); to 42USC4331(c), and 42USC4332(2)(B); and to 43USC1901(a)(3).

We are outraged that this BLM District has refused to cooperate with this organization so that we can write an adequate response to this inadequate document. What information is in your Analysis of the Management Situation???????? We don't know because you refuse to send it. Our only conclusion about the AMS, based on the content of this Draft, is 'GARBAGE IN, GARBAGE OUT'. Your refusal to supply us a copy of the AMS is in direct violation of 42USC4331(a): "The Congress...declares that it is the continuing policy of the Federal Government, in cooperation with...concerned public and private organizations, to use all practicable means and measures, including financial and technical assistance...to create and maintain conditions under which man and nature can exist in productive harmony..."; and 42USC4332: all agencies of the Federal Government shall--...(G) make available to...institutions, and individuals, advice and information useful in restoring, maintaining, and enhancing the quality of the environment."; 40CFR1502.21: "Agencies shall incorporate material into an environmental impact statement by reference when the effect will be to cut down on bulk without impeding agency and public review of the action. The incorporated material shall be cited in the statement and its content briefly described. No material may be incorporated by reference unless it is reasonably available for inspection by potentially interested persons within the time allowed for comment."; and BLM Manual 1372.73B: "The head of the office making copies may waive fees...if the requester can demonstrate that the information primarily benefits the public...". This group represents the public, a fact made clear by our conversations, our letter, and our past contacts with your district. A large amount of AMS material, especially in the totally faulty soils and economics sections, is incorporated into this Draft RMP by reference and was not made reasonably available to us, despite written and telephoned requests. A copy of our request letter and your response is attached for inclusion in the RMP record. The unavailability of this material to us makes it imperative that a new Draft RMP be written incorporating that material, with an entire new comment period. We continue to express the doubt that the AMS consists of 700 handwritten pages, many in pencil and nearly illegible. We have recieved free copies of AMS's from every other district which has been planning, and none have looked that way: all have been neatly typed documents.

The Preferred Alternative is not a multiple use-sustained yield Plan. In an area which can be described generally as an ecological disaster area, it: decreases the number of mule deer and pronghorn; sells public lands with high wildlife values; increases soil erosion to unacceptable levels; does absolutely nothing for recreation except introduce plans in a few already-overused areas which will probably limit use; recommends two Wilderness Areas out of six possible; so degrades the overall quality of the environment that 3600 pairs of non-game birds will be lost; and, in compensation for all these losses, to produce what this document calls "a balanced approach to multiple use", authorizes grazing levels 44% above present use; and does all these things without the benefit of even the most cursory cost-benefit analysis. Just the lack of any cost benefit analysis
41-1 mandates the rewriting of this entire Draft Plan before there can be meaningful comment.

We will make our comments in the order of 43USC1702(c)'s listing of the various multiple uses.

RECREATION

43 USC 1712(c)(9) says the BLM shall: "to the extent consistent with the laws governing the administration of the public lands, coordinate the land use inventory, planning, and management activities of or for such lands with the land use planning and management programs of other Federal departments and agencies and of the States and local governments within which the lands are located, including, but not limited to, the statewide outdoor recreation plans developed under the Act of September 3, 1964 (78 Stat. 897), as amended..."

This means Idaho's State Comprehensive Outdoor Recreation
41-2 Plan (SCORP)--just updated this year--must be of vital importance in this RMP's decisionmaking. However, SCORP appears to have been completely ignored, on these grounds:

1) SCORP predicts an large increase in Camping over the next 20 years. It specifically states that Lincoln, Jerome, and Minidoka Counties have a need for 399, 597, and 396 new campsites respectively (pages 119, 114, and 121). It is, of course, silly to ask BLM to provide all these campsites. BLM should provide at least 80% of its proportionate share of these campsites, based on the percent of the counties that it manages. This means about 240 campsites in Lincoln, 110 campsites in Jerome, and 110 campsites in Minidoka Counties. At present BLM has no campgrounds in any of these counties. This draft RMP plan does not call for any campgrounds or campsites in the future. Simple statements that at some future time, some sort of recreation plan will be drawn up, do not meet FLPMA's mandate for multiple use management (43USC1702(c)). Recreation must be fully integrated into this plan. Where will the SCORP-mandated campgrounds be located? What types will they be (fully developed with RV pads, semi-developed with simple picnic tables and outhouses, primitive and just fenced off from cattle)? How will responsibility for maintaining the campsites be divided among other staff (range, fire, etc) who frequent the remote areas in which these campsites are located? How will maintenance of roads to these campgrounds

be integrated with fire management's needs for better access and more firebreaks? How will these campgrounds and campsites be funded? (CIHD believes that money for fencing off camping areas can easily come from 8001 and other range improvement funds, under PRIA. For example, 43USC1901(a)(1): "vast segments of the public lands are producing less than their potential for...-recreation..."; 43USC1901(a)(3): "unsatisfactory conditions on public rangelands ...reduce the value of such lands for recreational and esthetic purposes..."; 43USC1901(a)(4): "the above mentioned conditions can be addressed and corrected by an intensive public rangelands maintenance, management, and improvement program involving significant increases in levels of range-land management and improvement funding for multiple-use values..."; and 43USC1902(f): The term "range improvement means any activity or program on or relating to rangelands which is designed to...control patterns of use...". Putting up fencing to keep cattle, sheep, and their droppings out of campsites is a completely reasonable use of range improvement funds for controlling patterns of use.) This plan should be changed to include a vigorous program of campsite creation. Semideveloped and primitive campsites should be created in the following areas, in accordance with good multiple use planning: Big Blowout Butte (Laidlaw Park); Sand Butte west of the Butte in excluded area;
41-3 Big Wood River (Preacher Bridge area); Wagon Butte; Laidlaw Butte (just east of Butte in good condition rangeland); Huff Lake (a small exclusion from the Raven's Eye WSA for campsite purposes); Bear Trap Cave; Split Butte; and others in similar key places. With Wilderness coming to the Great Rift and other lava areas, and with greater awareness of the hikeability of these areas, campgrounds will be necessary for people who dayhike in lava by day but carcamp at night.

2) SCORP predicts an increase in Walking/Hiking by the year 2000. It identifies a need for 36 miles of hiking trails in Lincoln, 60 miles of hiking trails in Jerome, and 64 miles of hiking trails in Minidoka Counties. BLM has, as far as we can tell, no hiking trails at present in these counties. This draft RMP calls for no trails to be constructed. Needs identified by SCORP must be addressed in the RMP, not in some future RAMP. We recommend that this Plan call for: a paved nature trail suitable for wheelchairs in lava areas north of Shoshone, along ID75, at
41-4 least 1 mile long, with well-signed, paved parking area; a two mile marked extension to the above trail (unpaved); a pair of systems of marked routes, each at least 12 miles long in the Ravens Eye area, based on loops of 2, 4, and 8 miles length, with trailheads at Sand Butte and Huff Lake Campgrounds.

Nature study, driving for pleasure, hiking, and camping have not historically been major desert recreational activities in Idaho. This has been due in large part to overgrazing and resulting small game and nongame wildlife populations; to poor road maps and minimal road maintenance; to poor trail maps, no trail construction or maintenance, and aesthetic impacts from overgrazing; and to lack of potable water, lack of cowpie free areas, and simple lack of designated campgrounds. Another major factor impacting recreational use of desert areas is public perception of rangelands along major highways, which have

frequently been devastated by fire and exotic invaders.

The Committee for Idaho's High Desert is working to change all these factors. We support increases in game and nongame wildlife, and work to protect natural values through ACECs and Wilderness Areas. We support improved maintenance of critical recreation access roads. We lead outings in which hikers are acquainted with desert hiking areas and techniques. We support creation of a wide range of undeveloped, semideveloped, and fully developed campgrounds in desert areas. And, we conduct frequent public education programs to overcome false public perceptions of low natural and recreational values in desert areas such as the Monument Resource Area.

As a result of these activities; of the wilderness study process, which is focussing attention on specific areas; of the probable designation of wilderness in this Resource Area; and of the overall predicted increase in walking and hiking and camping: we forecast a vast increase in recreational use of this Resource Area--an increase that would be 10 to 100 times current use levels, even without creation of campgrounds or trails. Craters of the Moon Wilderness has shown a very strong correlation of growth in wilderness use through time. Growth in hiking can be projected to almost 1200 visitors in the year 2000. This is a 333% increase over the 1979-1983 average. This increase is only in overnight use--day use in this lava area must be much higher than overnight use. This draft RMP does not even hint at the possibility of such an increase in lava hiking, or make any plans to accomodate it.

We specifically object to the numbers obtained through your "Recreation Methodology" section (Appendix G), as they are apparently manifested in your "Comparative Summary of Cumulative Effects" (Table 2-3). Your preferred alternative, C, increases erosion, increases grazing, reduces big game numbers, transfers 55000 acres into private ownership, and even reduces the number of pairs of nongame birds by 3600. We find it incomprehensible that you project only an eight percent difference in Nature Study
41-5 between this and Alternative D, which decreases erosion, decreases grazing, increases big game numbers dramatically, transfers only a few acres to private hands, and increases nongame birds by 9800 pairs. Our estimate is that your preferred alternative will so degrade the natural environment that nature study will increase at a lower level than with your No Action alternative--in the 25% range. We also estimate that Alternative D will result in a much higher level of nature study--in the 300% range. Please change your figures to correct this obvious error.

The same problem of failing to relate changes in environmental quality with changes in recreational use shows up in your Dispersed Recreation figures. With the no action alternative, with the same dismal ecological conditions the area has now, and with no new wilderness creation, you predict a 120% increase in
41-6 recreation. With your preferred alternative, two wilderness areas, less wildlife to see, and increased grazing impacts, you predict a 125% increase. With Alternative D, six wilderness areas, much better ecological conditions, and much more wildlife, you predict a 136% increase. We simply disagree with these figures. Alternative C seems OK, with wilderness area designa-

tion outweighing grazing impacts to make a net 5% increase. But Alternative D would doubtless result in a much greater level of recreation increases. ORVers would not really be impacted by these wilderness designations because these areas are in large part lava, and simply so far from population centers that ORV use is slight. Thus, we urge you to include a 500% increase in dispersed recreation use with Alternative D.

41-6 Cont.

RANGE

The non-lava portions of the Monument Resource Area are predominantly in a state of ecological disaster because of overgrazing and fire. As the Draft Plan states, 95% of the lands are in poor, fair, or seeded condition--only 2% are in good condition. The Preferred Alternative does nothing to change this, except seed more areas to exotic vegetation, and build stock watering pipelines to degrade at least half of the 2% good range. CIHD believes that the Monument RMP range and grazing portions should first examine the land in light of the No Action situation--the 97,000 AUMs of present active use. How is the land faring right now under this level of grazing? Is this disastrous condition improving? The answer is no--trend in the RMP area is generally static. How are erosion levels under current grazing (97000 AUMs)? They are very high--4.8 tons per acre.

The critical issues of condition, trend, and erosion (not to mention wildlife) make reductions under current active grazing levels absolutely necessary. We protest your judgement that "Poor condition areas with few native perennials (highly disturbed) may show upward trend with decreases in grazing and low incidence of wildfire, but would not change condition class." (page D-11). With scattered seedings of native grasses, as we propose, seed sources for regeneration of native perennials would be able to make even poor condition range eventually become good condition range--with decreases in grazing and proper grazing management. No alternative you have generated includes the idea of seeding native grasses to improve ecological condition in severely impacted rangelands. Further, your Irreversible or Irretrievable Commitments of Resources section does not address the most important issue facing Idaho range management: what is the long term, cumulative impact of seeding only exotic species of grasses? You simply say that "land and vegetation would be committed for the lives of the projects." (page 4-62) The rewritten Draft and the Final Plan should address the question of just what are the lives of these projects. Already, 20% of the grasslands in this RMP area have been seeded to exotic grasses. We view that percent to be an absolute ceiling for percent of BLM land so altered in any planning area, even one so devastated as this.

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41-8

CIHD proposes that, to reverse the trend toward exotic grasses and weeds of all types, 50% of all new regular seedings and 75% of all post-fire seedings be to 100% native grasses, forbs, and shrubs. These seedings should include Idaho fescue, bluebunch wheatgrass, Basin wildrye, bitterbrush, at least 3 pounds per acre of native forbs, and other native plants as site

may dictate. The seedings should be in 5 to 10 acre tracts, well fenced, with no grazing for the first three years, and with only 25% utilization grazing in successive years to promote utmost plant vigor for seed production. The tracts should be well scattered, in large and small allotments. They should be monitored four times per year to guard against fence problems.

We feel strongly that in the rewritten Draft and and Final Plan, an alternative must be developed that provides for such seedings, which would have many good effects. Funds would come from range improvement and fire funds.

41-9

CIHD is also concerned with the current Draft Plan's monitoring trigger point for vegetation utilization (page A-3). The difference in plant vigor between 50 and 60% utilization is so great that we prefer 52% as a more conservative management trigger point. Please develop this approach in an alternative in your rewritten Draft and the Final Plan.

41-10

We are also concerned about your schedule of 10 year inspection of allotments for condition. Please include provisions for 3-year inspection cycles for condition (at the same time as trend) in the rewritten Draft and the Final RMP.

41-11

Last, we are opposed to digging a well and building a pipeline in Laidlaw Park for stock watering. That area has high recreational, wildlife, and natural values (see our ACEC and wildlife comments). We feel that the need for seedings is so great, and the costs of pipelines so high, that this and other pipeline projects must be abandoned in favor of seedings of native grasses. Specify which alternatives don't build the Laidlaw Park pipeline, and adopt one of them.

41-12

MINERALS

Our only comment on minerals concerns closures around ACECs and AGIs. The proposed 250 foot closure around AGIs (page 2-73) is inadequate to protect the natural character of these areas. We recommend a one mile radius closed to all mineral entry and leasing around both AGIs and ACECs. This applies to National Natural Landmarks. Include this proposal in an alternative and adopt it.

41-13

Mineral material use should be prohibited within the proposed Dry Cataracts National Natural Landmark. Your economic analysis must include an estimate of the value of such mineral materials; a judgement on whether alternate sources for these materials exists; and a report on what the impact of mineral material removal would be on the Natural Landmark.

41-14

WATERSHED/SOILS

This document is sorely lacking in soils data. Perhaps this lack of data is the reason why it treats the vital soils resource so poorly. The rewritten Draft and the Final RMP must include a table of soil erosion rates by allotment that includes:

41-15

1) estimates of cumulative erosion since grazing began;
2) estimates of present erosion rates;
3) estimates of future erosion rates by alternative;
4) T-levels for each allotment (erosion tolerance levels);

5) and estimates of soil creation (as mentioned on page 4-63)

41-15 Cont.

Inclusion of such a table might alter decision making. This must happen, in light of 43USC1712(c)(1) and (4); and of 43USC1702(c), which defines multiple use as the "harmonious and coordinated management of the various resources without permanent impairment of the productivity of the land..." The preferred Alternative does the following three things in direct contradiction to those items:

1) average erosion rates are increased to over 5 tons/-acre/year;
2) number of acres with reduced soil productivity are increased by over 10000;
3) number of acres with severe erosion are increased by 3000.

These figures are amazing. The BLM simply must adopt an alternative that does not include any increases in erosion in any category. The rewritten Draft and the Final RMP must include more information on just how BLM arrived at its figures for acceptable erosion rates. It is our impression that erosion T-levels may fall within 2 to 5 tons per acre, depending on soil type. Yet your soils analysis, mailed to us and included in this comment letter for the record, calls wind erosion rates of 5 to 50 tons/acre/year slight! In justification, a 1961 report is cited, with no page reference. The same analysis calls 5 to 15 tons/acre/year from water erosion, moderate! No published source is given--and apparently, in doing your soils inventory, T-levels were not established. The new Draft and the Final must include detailed references by book and page to justify these extraordinarily high erosion rates.

41-16

These high soil erosion rates are another reason why monitoring trigger points for utilization should be lowered. At 59% utilization of forage, there is insufficient cover to prevent wind and water erosion.

41-17

WILDLIFE AND FISH

This plan reduces the numbers of pronghorn and mule deer, in direct conflict with Plans approved by the Idaho State Department of Fish and Game. It also fails to recognize Fish and Game plans for increases in Sage Grouse numbers. This Draft Plan is even at odds with itself on wildlife issues. On page 3-4 it engages in a lengthy apology for why wildlife habitat quality is declining, blaming wildfires and loss of historical winter range for wildlife problems. It then goes on to say, "forage availability to big game and sage grouse is not limited by grazing levels or season of use by livestock... Change in grazing management is not an important management consideration at this time." Since this is a 20 year plan, "at this time" must mean, "at this time or any time in the future." NEVERTHELESS, reduced grazing levels under alternative D permit large increases in deer, antelope, and sage grouse. AND, page 4-16 states that the preferred alternative's land sales would include critical antelope winter range and would adversely impact the population!

41-18

CIHD does agree that seedings can improve wildlife habitat;

the section on Plowing, Disking, and Seeding on page D-7 does a good job of urging irregular patterns in seeded areas (we recommend 20 acre maximum seeded areas), and seeding of grass, forb, and shrub seeds--except forbs and shrubs should be included in all seedings. We also agree with the philosophy behind Prescribed Fire on page D-6. There must be good coordination on timing fire to prevent Little Park-type errors.

The IDFG Goals, Objectives and Policies Plan for the years 1975-1990 (hereinafter GOPP) states Pronghorn goals on pages 31 and 32. Pronghorn populations are to increase well above current (1975) trends, and hunter success rates are to increase also (less days per animal). They state under Problems and Strategies that land management agencies should give "more consideration to antelope in grazing plans", and "provide watering areas that would allow the expansion of existing pronghorn range."

The IDFG 1981-1985 Trophy Species Management Plan section on Pronghorn (pages 26-28) sets a goal for this area for "increase population, increase harvest, and provide more recreation." In spite of this clear direction from IDFG plans, and in spite of 43USC1712(c)(9): "to the extent consistent with the laws governing the administration of the public lands, coordinate the land use inventory, planning, and management activities of or for such lands with the land use planning and management programs of...agencies of the States and local governments... Land use plans of the Secretary...shall be consistent with State and local plans to the maximum extent...consistent with Federal law and the purposes of this Act."; in spite of this, the preferred Alternative under this Draft RMP decreases pronghorn numbers by 3 percent. In the rewritten Draft and the Final RMP, an alternative must be developed and adopted that meets the IDFG goal of an increased pronghorn population.

41-19

The IDFG GOPP plans for a vast increase in mule deer levels for 1990 over current (1975) trend levels. IDFG goals are to:

1) rebuild mule deer numbers;
2) increase harvest;
3) and increase success rates.

The IDFG 1981-1985 Mule Deer Species Management Plan for Mule Deer has the following goals (pages 70-74 and 84-85):

1) increase resident and wintering populations, maintain harvest, and increase recreation in Unit 52;
2) maintain population and recreation in Unit 53;
3) and maintain population and increase recreation in Unit 68.

The 81-85 Plan says, "long range impacts of agricultural development in this Area could be substantial" on mule deer. The rewritten Draft and Final Plans should detail just how BLM has coordinated with IDFG on determining which Desert Land Entry and Carey Act applications are granted. This Plan also says, for Units 45 and 52, that Management Direction is to urge "BLM to allocate forage for more deer."(page 71). BLM must respond to this identified need for more forage for deer by allocating more forage to deer!

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41-21

The IDFG GOPP calls for increases in sage grouse numbers and hunter success. It says: "If adequate consideration is given by federal and state land management agencies to preserving and

enhancing existing sage grouse habitat and more refined management implemented, rebuilding of sage grouse populations can be accelerated." This draft plan increases sage grouse populations by one percent--one percent! Increased hunter success, as called for by the IDFG plan, cannot be achieved under the proposed alternative.

The IDFG 1981-1985 Upland Game bird Management Plan identifies the Monument Resource Area as having high density sage grouse populations. Goals for sage grouse populations are: increase populations, increase harvest, provide more recreational opportunity (page 22). Under Programs, pages 24-25, it says: "The Department will request (1) that land managers avoid...detrimental brush spraying; (2) that brush removal projects be timed to protect forbs; (3) that fire or other alternatives to herbicides be used when brush control is necessary; and (4) that land managers attempt to maintain conditions favorable to sage grouse." Also: "encourage land managers to (1) develop watering facilitiues for small animals; (2) fence spring and seep areas to exclude livestock; (3) manage existing water facilities to provide water throughout summer and autumn..." Also: protect traditional sage grouse breeding grounds through special consideration for them and inventorying. Alternative D makes it clear that with reduced grazing, there could be a 10% increase in sage grouse populations. Obviously, that alternative does a much better job of creating favorable habitat conditions than the preferred alternative, which only increases numbers by 1%. With all these considerations in mind, we are appalled when we look at the 50% of brush removals and seedings planned for Laidlaw Park, which would incrase manipulated range percentages to near 60%. While some manipulation of vegetation can help sage grouse in that critical wintering and nesting habitat, we believe the total amount of range alteration in Laidlaw Park allotment should be held to 15% of the total area.

We also hold that this draft plan is acting contrary to the entire principle of 43USC1712(c)(2) and 43USC1701 and 43USC1702(c) by including complete plans for extensive range improvements in this vital sage grouse habitat, at the same time as it refuses to discuss the issue of these impacts on those sage grouse. Instead, this draft plan says that at some indefinite future time, some sort of sage grouse Habitat Management Plan will be written to do something that (hopefully) will help sage grouse. THIS DRAFT PLAN IS REQUIRED BY LAW TO BE A MULTIPLE USE PLAN. IT VIOLATES THE ENTIRE PRINCIPLE OF INTERDISCIPLINARY PLANNING TO ALLOCATE THE GRAZING RESOURCE TO THE NTH DEGREE, WHILE PUTTING OFF ALL STUDY OF THE SAGE GROUSE RESOURCE TO SOME FUTURE TIME. The rewritten Draft and the Final Plans must include the sage grouse resource in the plan, and not just leave
41-22 the remainder after grazing is accomodated, to the sage grouse. They must substantially increase sage grouse numbers, in line with Fish and Game plans.

The rewritten Draft and Final plans must also include and adopt
41-23 alternatives that meet IDFG mule deer goals for this area by allocating more forage for deer, and by retaining tracts that are important habitat for deer. The intent of these IDFG plans must be followed, not just the numbers given in them. IDFG has had

inventory problems in the past and will have them in the future, due to funding problems. If their plans say increase game numbers and hunter success, then BLM should work to do this--and not decrease forage for wildlife because IDFG numbers are low.

NATURAL SCENIC, SCIENTIFIC, AND HISTORICAL VALUES

This Plan does a fair job of identifying potential Areas of Critical Environmental Concern, in line with 43USC1712(c)(3). We support your decision to create ACECs in Substation Tract, Vineyard Creek, and Box Canyon/Blueheart Springs. However, the following areas were overlooked:

Sand Butte. Sand Butte has scenic, wildlife, and natural system values of substantial state and national significance. The Butte itself has very fragile sandy soils; fragile and rare vegetation, including a wide variety of grasses and forbs; the entire area's only ferruginous hawk nest; and a unique geologic nature which has not yet been studied. The potential for ORV damage is enormous. Certainly, even the very faint way into the Butte's floor is distracting. The rewritten Draft and the Final
41-24 plans should nominate and declare the Butte area to be an ACEC, to protect these resources. We do not feel that your proposed ORV closure (which we support) or recomended wilderness designation (with Congressional action a possible 10 years away) will go far enough to protect this special area until it can be scientifically studied.

Last Chance Kipuka. Last Chance Kipuka is in the northwest portion of Laidlaw Park (SW4 Sec 21). A faint way now leads to it. The area east of the kipuka contains excellent condition grasslands which provide a picture of how Laidlaw Park looked prior to overgrazing. CIHD recommends that an ACEC be established with in this approximate area: NE4 Sec 32; NW4 Sec 33; Sec 28; E2 Sec 21; and SE4 Sec 16. These areas have scenic, wildlife, natural process, and cultural and historic values. The excellent grasslands, in contrast to the other 98% of the Resource Area; the proximity to a lava wilderness; the opportunity to gain an historic perspective on how the area looked to the first sheepmen and cattlemen; and the sage grouse nesting habitat, deep in the largest undisturbed native grasslands portion of Laidlaw Park, all mark this area as one of substantial state and national significance.

We also recommend that Silver Sage Playa not be placed in a transfer category, as Alternative B calls for. While your analysis indicates that it does not qualify for full ACEC protection, we feel that time may change this judgement. Don't sell that ten acres of land.

On page 2-64 you state that under alternatives B, C, and D, four cultural resource management plans will be developed. On pages 2-28 and 2-29, you specifically mention only two such plans. The rewritten Draft and Final plans should state where
41-25 the other two plans are being written for, and when they will be written.

We are concerned about impacts to surface sites from sheep-
41-26 cattle conversions. The greatly increased trampling of cattle can damage such cultural sites. Conversion areas must be subject

41-26 Cont. to Class III inventories as specified in BLM Manual Section 8111.4. Develop and adopt an alternative that mandates such study.

ECONOMICS

The greatest single flaw in this plan is its utter failure to carry out 43CFR1610.4-6: "The District Manager shall estimate and display the...economic...effects of implementing each alternative considered in detail." This detail is entirely lacking in this RMP. The only economic analysis in the document consists of a summary of ranch budgets (including by reference information in the AMS); a review of farming costs which shows almost zero benefits from converting range land to agricultural land; page 2-77's "Economic Conditions" section; and one page (J-5) in the Appendix. The terms "costs", "benefits", and "economics" do not even appear in the index.

We question many of the assumptions in that Table J-3. You assume an average wage of 18500 for range improvement-related jobs (900,000 income divided by 42 jobs). Also, 19200 for one maintenance job. These figures appear to be extremely high. What is the source for these figures? (It may be in the AMS but we can't get a copy of it.) Are these jobs for one year at a
41-27 time, or are they spread out over some given life of the plan--i.e., 42 jobs divided by 15 years equals 2.9 full time jobs in any year??????? Exactly how many full-time equivalent, permanent jobs will be created by these range improvements, at what predicted annual income? And are these family and operator "jobs", which don't really result in a payroll, or are they hard-money paid positions?

Your method for figuring grazing fee charges is ridiculous. A five year average is silly. The trend in every one of the past five years is DOWN. We anticipate, based on statistical analysis, that fees will level out at about one dollar per AUM.
41-28 Include a statistical correlation between time and grazing fees in your RMP, and use the resulting value (projected over 15 years, based on the last 5) in your rewritten Draft and the Final RMP.

You state (page 3-37) that the Taylor Grazing Act explicitly states that grazing rights have no capital value. You then attach a capital value to those rights. While we agree that the
41-29 high level of government subsidy does have some possible capital value, we feel those values do not belong on a table like J-3. Remove them from the Draft and Final RMP.

Your Alternatives A, B, and C state that no ranches would be "threatened". This statement is contradicted by a high foreclosure rate on livestock operations in the multicounty area, and (obviously) by the fact that the entire livestock industry is unhealthy--as evidenced by the continually decreasing grazing fee
41-30 rate, and the correspondingly increasing level of federal subsidy needed to keep the industry afloat. We cannot accept your "no ranches threatened under current conditions" conclusion without an analysis of livestock operation sales, foreclosures and bankruptcies in the multi-county area over the past 5 years. How many have been sufficiently threatened to go out of business? If

41-30 Cont. the answer is none, then we can accept your theory. Otherwise, we believe at least twenty percent of livestock operations are currently threatened. This information must be included in the rewritten Draft and Final RMPs. It may be in the AMS, but we can't get a copy of the AMS, so put it in print for us.

Of course, once you get your recreation use figures corrected, the recreation section will change drastically. We cannot understand, however, why you only figure 9800 dollars per year wages in the recreation industry (2,000,000 divided by 202
41-31 jobs equals 9800 dollars per year). What is the basis for these figures? Is it the same document as you consulted for the livestock workers' wages? Again, are these job-years, or are they permanent, full-time jobs? And are they family/operator jobs, or wage-paying positions?

Your analysis of economic benefits from sales of potential farm land, and from allowing Desert Land Act and Carey Act entries, is flawed. You are taking one farm at a time, when you should be looking at the big picture of agriculture in the multi-county analysis area. CIHD is concerned about cumulative effects of dumping super-cheap, almost-free federal land on the agricultural land market to compete with family farmers who are having serious trouble making payments on much more expensive private land. How many farms have been foreclosed on in the multi-county
41-32 area in the last five years? These figures belong in the rewritten Draft and Final RMPs. A simple insertion of higher land costs into your list of assumptions (page J-1) and your Table J-1 makes it clear that existing farms in the area are losing money. How will this dumping of free farmland (at $702.86 per year for 210 acres) impact other operations? Also, what is the present average level of direct and indirect federal subsidies to farms in this area? How does this average figure compare to the subsidies directed at the new farms you wish to create through sales and grants? These question must be addressed in your RMPs. It seems clear to us that only the smallest tracts, with the least wildlife values, the highest possible soil values, and the highest management costs, should be passed on. Any lands with wildlife values must be retained!

You assume (page 4-13) that the Federal Government will rsceive a benefit of $100 for every acre transferred. How was this figure arrived at? What are the administrative costs of
41-33 such large-scale sale projects in other Idaho districts, on a per acre basis? What are this district's average annual per acre management costs? These questions must be answered in the rewritten Draft and the Final RMPs.

The final line in your "Detailed Comparison of Effects of the Alternatives" is ludicrous: Annual Costs (Range Improvement and Fire). Are these the only costs associated with BLM activities in the Resource Area? What about range costs? What
41-34 about monitoring costs? What about administration costs, which must be at least 75% accountable to range activity? What about recreation costs? What are the costs of BLM maintenance of roads to and vegetation in range improvements (pages D-6 and D-7)?

HOW CAN A COST BENEFIT ANALYSIS BE CONDUCTED WITHOUT THIS INFORMATION?

Perhaps this information is in the AMS. However, we can't

get a copy of the AMS despite telephone and written requests.

The rewritten Draft and the Final RMP must include these and other costs. One page is not enough to present a detailed 41-35 picture of economic impacts as required by 43 CFR 1610.4-6. The new summary of costs and benefits must clearly differentiate between grazing-associated and other costs.

WILDERNESS

This plan addresses the fate of six roadless areas. The Committee for Idaho's High Desert supports wilderness designation for three of the six areas. Sand Butte has exceptional natural values, with a high degree of biological diversity. It has a substantial mule deer population. It has high geological interest, which go hand in hand with its scenic attractiveness. It contains "Qb2" and "Qb4" type lavas and associated soil profiles. It is manageable as wilderness and should be so preserved.

Raven's Eye is one of Idaho's premiere desert roadless areas. It contains "Qb1", "Qb2", and "Qb3" lavas and associated soils. Together with the contiguous Sand Butte area, it provides a continuum of lava desert processes from fresh lava to older (but still recognizable) lava, along with a wide range of associated soil and vegetation development levels. It also contains Broken Top, a very special geologic feature that dominates an area of grasslands which do have potential to return to good or excellent condition class. The Broken Top portion of Raven's Eye is a logical and geological extension of Sand Butte WSA. A small area of the Raven's Eye WSA near Huff Lake should be excluded from the wilderness recommendation for campground development.

We support wilderness for the Little Deer area. While we are not concerned about exclusions along its south side, we want all the Little Park portions included, for sage grouse habitat protection. Section 16 in T2S R23E should be included in the WSA boundaries.

CONCLUSION

This Draft Plan must be rewritten and reissued to comply with FLPMA's multiple use mandate. At present, it does not even address the issues of economics; recreation; soils; or natural and scientific values. It does not contain any alternative which adopts creative range management techniques to reverse the problems which plague this area.

An alternative must be developed which:

1) seeds native grasses in scattered plots which are maintained at high vigor, to restore native seed sources to 41-36 depleted areas, so that those areas can advance from poor condition to good and excellent condition.

2) increases mule deer, antelope, and sage grouse numbers to conform with Fish and Game plans. This alternative should spend range improvement funds to create water sources for game, so that they can better utilize available forage, and must also use those funds to plant bitterbrush and other needed shrubs and forbs.

3) meets identified demands for campsites and trails

4) has realistic, detailed economic analyses.

Brumbaugh

Response to Letter Number 41

41-1 The range management program is the only area where reasonable estimates of costs and benefits can be made. A cost-benefit analysis for range improvement proposals will be made prior to issuance of the approved Monument RMP.

41-2 The 1983 SCORP was not released until after the draft Monument RMP/EIS was ready for print (March 1984). Idaho Outdoor Recreation Profiles and correspondence with John Barnes, the Idaho Parks and Recreation SCORP Coordinator, were considered in preparing the recreation section.

The recreation profiles presented current and projected visitor use days for various recreation activities but did not specifically address additional numbers of facilities required. Camping activity in Minidoka and Lincoln counties is expected to increase 55 percent and 57 percent, respectively, over the next 20 years. Most camping use within these counties is presently dispersed and is not dependent on facilities. It is felt that these projected camping needs can be accommodated with the RMP management guidance.

The Idaho SCORP recommends the number of campsites in Lincoln and Blaine counties increase by about 4,000 percent by the year 2000. This is unrealistic. These figures are based on campsites per projected population and do not recognize other factors such as a lack of resources to attract campers. Most campers in Lincoln and Minidoka utilize campsites in adjacent counties near water bodies or in the mountains. Within the Monument Planning Area, Lincoln and Minidoka counties simply do not contain the resources to attract this amount of camping use.

41-3 The areas mentioned, with the exception of the Little Wood River/Preacher Bridge area, are extensive recreation use areas (dispersed) rather than intensive. Campground development will be considered in the development of Recreation Area Management Plans or Wilderness Management Plans if justified by a need for resource protection or by demand for such facilities.

41-4 A Resource Management Plan (RMP) establishes land use allocations, multiple use guidelines, and management objectives for a given planning area. "...It is not a final implementation decision on actions which require further specific plans, process steps, or decisions..." (43 CFR 1601.0-5[k]). These kinds of specific development plans clearly fall into the category of activity plans as discussed on page 2-13 of the draft.

41-5 Alternative C recognizes key areas for nature study including Box Canyon/Blueheart Springs, Vineyard Creek, Substation Tract, Raven's Eye WSA, and Sand Butte WSA. These key areas would receive increased nature study use because of enhancement of their naturalness and/or increased public awareness of the areas because of their special designations. In Alternative D, inclusion of other areas, which may have somewhat lower values for nature study, would not increase nature study opportunities dramatically.

41-6 Recreation use depends on adequate opportunities for a particular activity. Providing additional opportunities for dispersed recreation without a corresponding demand may enhance the experience, but may not substantially increase use. We do not expect demand for dispersed recreation use to increase anywhere near 500 percent.

41-7 The rate of successional change in less than 12-inch precipitation zones dominated by cheatgrass is very slow. The assumptions on page D-11 of the draft reflect the expected plant community compositions after 20 years, and little change is expected in such a short time. The discussion about vegetation has been expanded on pages 3-12 and 3-13 of the final EIS to clarify the competitive nature of cheatgrass and the difficulty of overcoming cheatgrass competition. The results documented on page 3-12, along with observations within the Shoshone District, have discouraged the practice of seeding to improve ecological condition. Given the high cost of seed, the high cost of seeding small areas, the low probability of seedling establishment, and the even lower probability of significant improvements in ecological condition, we are unwilling to invest public funds on seedings of this type. If the BLM performed seedings as described in this letter using the few species capable of competing with cheatgrass and protected them to "promote utmost plant vigor for seed production," other forces would likely prevent significant ecological improvement. Relatively slow improvement would likely be halted by wildfires that, due to the flammability and widespread presence of cheatgrass, are beyond our ability to completely control. We simply cannot prevent the loss of these types of new seedings until some method of reducing the fire frequencies of this area is found.

41-8 Cheatgrass is the real ecological villain in this case. This alien species evolved under centuries of intensive grazing by large herbivores, and has developed competitive characteristics lacking in our native species. Now that cheatgrass has developed a stranglehold on vast areas of rangelands, a logical approach is to seek species that possess the characteristics necessary to compete with cheatgrass. Most native species have been unsuccessful in competition with cheatgrass, whereas exotics like the created wheatgrasses have shown more success. The crested wheatgrasses have evolved under environments similar to those that spawned cheatgrass, yet they have similar growth forms and phenology to our native bunchgrasses as well as occupying similar habitats. Crested wheatgrasses also possess a tolerance of fire not shared by most native bunchgrasses.

Given the failure of native species to make substantial gains against cheatgrass, the success of the exotic wheatgrasses is welcomed. A sagebrush/crested wheatgrass vegetation type is ecologically preferable to sagebrush/cheatgrass or cheatgrass-annual weed types.

Some crested wheatgrass seedings have persisted in excess of 20 years in this area. Reproduction of crested wheatgrass is evident within some seedings here, and occasionally some expansion into adjacent cheatgrass can be seen.

The project life span for a successful seeding is considered to be 20 years. Usually by this time, sufficient amounts of sagebrush and forbs have become established to decrease the production of seeded species by 50 to 75 percent.

41-9 The expanded discussion under "Alternatives Eliminated From Consideration" beginning on page 2-11 of the final addresses this comment.

41-10 Sixty percent utilization of key forage species should leave adequate watershed cover when one considers that 98 percent of the planning area also has cheatgrass, shrubs, and other lesser-grazed vegetation in addition to the target species. At 60 percent utilization of key species, 30 percent (or less) utilization of other species is common in this area.

The 60 percent figure is based upon this more than purely upon plant physiological requirements since these are also strongly influenced by grazing systems. For example, if perennial grasses are grazed the same season each year, no more than 60 percent should be used as a rule, but greater utilization can be made under rotation grazing systems without harming the plants. Upon annual ranges, 60 percent use is adequate to maintain seed production, and hence, stands of annuals, on a sustained basis.

41-11 Three years is insufficient time for detectable condition changes to occur in an 8- to 12-inch precipitation zone. Some changes that could be detected would be establishment of a new seeding, or loss of a seeding, or sharp downward change in condition under extreme, abusive grazing. Downward trend is a "trigger" for management concern (see page A-3 of the draft RMP/EIS) and areas displaying downward trend will be monitored more frequently than every ten years. However, budget constraints and the low probability of detectable change make a general evaluation of the entire planning area every three years impractical and unnecessary.

41-12 A well and 15 miles of pipeline are proposed for the Laidlaw Park Allotment in Alternatives C and D. A well and 28 miles of pipeline are proposed for Alternative B. No well or pipeline construction is proposed under Alternative A or Sub-Alternative D.